



U.S. Department  
of Transportation  
**Federal Aviation  
Administration**

800 Independence Ave., S.W.  
Washington, D.C. 20591

July 21, 2015

Exemption No. 11541A  
Regulatory Docket No. FAA-2015-0423

Mr. Jonathan Rupprecht  
Counsel for Vision Pictures, LLC  
Rupprecht Law, P.A.  
324 Datura Street, Suite 200  
West Palm Beach, FL 33401

Dear Mr. Rupprecht:

This letter is to inform you that we have granted your petition for an amendment. It explains the basis for our decision, describes its effect, and lists any changes to the original conditions and limitations.

By letter dated May 17, 2015, you petitioned the Federal Aviation Administration (FAA) on behalf of Vision Pictures, LLC (hereinafter petitioner or operator) for an amendment to your current exemption. That exemption from §§ 61.23(a) and (c), 61.101(e)(4) and (5), 61.113(a), 61.315(a), 91.7(a), 91.119(c), 91.121, 91.151(a)(1), 91.405(a), 91.407(a)(1), 91.409(a)(1) and (2), and 91.417(a) and (b) of Title 14, Code of Federal Regulations (14 CFR) allows the petitioner to operate a UAS to perform aerial data collection and closed-set motion picture and television filming. You requested an amendment to add the DJI Phantom 3, DJI S900 and Aerigon.

In your petition, you indicate that there has been no change in the conditions and reasons relative to public interest and safety that were the basis for granting the original exemption.

The FAA has determined that good cause exists for not publishing a summary of the petition in the Federal Register because the requested amendment to the exemption would not set a precedent, and any delay in acting on this petition would be detrimental to the petitioner. The unmanned aircraft authorized in the original grant are comparable in type, size, weight, speed and operating capabilities to those in this petition.

#### **Airworthiness Certification**

In accordance with the statutory criteria provided in Section 333 of Public Law 112–95 in reference to 49 U.S.C. § 44704, and in consideration of the size, weight, speed, and limited

operating area associated with the aircraft and its operation, the Secretary of Transportation has determined that this aircraft meets the conditions of Section 333. Therefore, the FAA finds that relief from 14 CFR part 21, *Certification procedures for products and parts, Subpart H—Airworthiness Certificates*, and any associated noise certification and testing requirements of part 36, is not necessary.

### **Our Decision**

The FAA has determined that the justification for the issuance of Exemption No. 11541 remains valid and is in the public interest. Therefore, under the authority contained in 49 U.S.C. 106(f), 40113, and 44701, delegated to me by the Administrator, the operator is granted an amendment to add new aircraft to its UAS operations.

The operator shall add this amendment to its original exemption.

### **Conditions and Limitations**

All conditions and limitations within Grant of Exemption No. 11541 remain in effect except as follows. Condition No. 1 has been updated to reflect the additional aircraft.

Failure to comply with any of the conditions and limitations of this grant of exemption will be grounds for the immediate suspension or rescission of this exemption.

1. Operations authorized by this grant of exemption are limited to the DJI S1000, DJI Phantom 3, DJI S900, and Aerigon when weighing less than 55 pounds including payload. Proposed operations of any other aircraft will require a new petition or a petition to amend this exemption.

This exemption terminates on May 31, 2017, unless sooner superseded or rescinded.

Sincerely,

/s/

John S. Duncan  
Director, Flight Standards Service

Enclosures

5/17/2015

U. S. Department of Transportation  
Docket Management System  
1200 New Jersey Ave., SE  
Washington, DC 20590

Re: Amendment to Vision Pictures, LLC Exemption #11541 in Regulatory Docket No. FAA-2015-0423

Dear Sir or Madam:

Vision Pictures LLC hereby requests an amendment to exemption #11541 to allow for three (3) additional types of unmanned aircraft systems (UAS) that fully comply with the conditions of the Petition for Exemption.

Vision Pictures wishes to operate the DJI Phantom 3, DJI S900 and the Aerigon under the same terms and conditions contained in exemption #11541. Attached hereto, **and submitted as highly proprietary and confidential documents**, are the Flight Operations and Procedures Manuals (FOPM) for the three (3) additional UAS. All operations of the additional UAS will be in full compliance with the terms of exemption #11541.

As this is an amendment to an existing exemption asking for only the addition of other types of unmanned aerial vehicles, **Vision Pictures respectfully submits that good cause exists so that notice does not need to be published in the Federal Register for the requested amendment.**

Please contact the undersigned should you have any questions concerning this request for an amendment to exemption #11541.



Sincerely yours,  
Joel S Petersen  
Vision Pictures LLC  
6844 Cahuenga Park Trail, Los Angeles CA 90068  
(323) 484-4022

cc:

Jonathan B. Rupprecht, Esq.